STATE OF WASHINGTON
DEPARTMENT OF INFORMATION SERVICES
Olympia, Washington 98504-2445

July 14, 2000

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Room TW A325
Washington, D.C. 20554

Re: CC Docket No. 99-200, Numbering Resource Optimization Order

Dear Ms. Salas:

The Washington State Department of Information Services (DIS) provides telecommunications services to over 400 public organizations, including state and local government. DIS has grave concerns regarding the FCC's proposed Numbering Resource Optimization Order. We view that the Order, in its present form, will cause irreparable harm to our ability to cost effectively deliver services to our 52,000 local telephone service subscribers. We suspect that this situation would be replicated across the nation for similar large business and government customers.

Telephony networks, which combine Centrex and PBX service in a common dial plan, are the preferred local telephone service solution for our 52,000+lines network in 40+ cities across the State. In addition, several of the State's universities use similar networks with an equivalent number of lines. These networks provide manifold benefits, i.e. attractive acquisition and operational costs, reduced costs for calls within the system, and an implicit awareness of "internal stations". In fact, both employees and constituents recognize the State as its own "community" within an exchange area. For subscribers, these telephony networks facilitate abbreviated dial plans that simplify dialing within a major community of interest.

For the State's local telephone service to function efficiently, known, homogenous number ranges are critical. Homogenous number ranges are necessary to efficiently manage the many tables (e.g. station, restriction, feature, long distance, call routing, and billing) that govern its use. These number ranges also allow for an implicit awareness of an "internal" or system station, and therefore which numbers can be called using abbreviated dialing. This simplifies the use of the telephone system and reduces the costs associated with providing local telephone service for State agencies.

Integrity in the blocks of telephone numbers available to the state has an immediate and direct impact on public services. Our presence at the State capitol in Olympia is the classic example. For more than 20 years, the public has been conditioned that predetermined prefixes (902, 753, 664, 725, 586, 407) are "the State". From experience in other cities, we know that changes in the State's number plan result in significant confusion to the general public. This is a major concern to State agencies struggling to remain easily accessible to the diverse constituency they serve (e.g., unemployed; homeless; sight and hearing impaired; and clients on welfare and medical assistance; K12 schools; community colleges and Universities; clients under the care of the State in its medical and correctional institutions).

In addition, we have first hand experience with the extreme frustration that results when a number in one of the State's prefixes moves from the "Aging" classification and is assigned in error to a public citizen. The citizen now must endure the many calls intended for the public agency previously associated with that number. Under the proposed FCC Number Optimization plan, what is today a rare occurrence could become the norm. On the network side, any new number will likely be outside our current numbering plan destroying our ability to support an abbreviated dialing plan. We will truly lose our identity as "Washington State government".

The State of Washington is nationally recognized as a **leader** in digital government (number one every year in each of three nationwide surveys of state government conducted by the Center for Digital Government, Government Technology magazine and the Progress and Freedom Foundation). This success can be directly related to the state's success in providing each citizen with the opportunity to conduct business in a one to one relationship with government. Given the State's diverse constituency, this requires a very sophisticated information technology infrastructure in multiple mediums. For many of the clients, telephony is the only option.

As such, telephony solutions must provide access 7 days a week by 24 hours a day, allow for two way communication (**receive** as well as leave voice messages) between government and the client, and enable direct access for clients to easily subscribe, change, or check the status of critical benefits. The ability to implement and manage the complex telephony infrastructure required to support these applications will be directly impaired by the effects of the Numbering Resource Optimization Order.

In addition, the State sees an incalculable increase in its cost of doing business. Typically, any technology driven system is more efficient when its operation can be accomplished in tables that include pre-defined, sequential ranges of membership (in this case telephone numbers). The cost of administration, storage, operation, and maintenance complexity dramatically increases for both the LEC and the state whenever that membership has to be managed at the "entity level". Loss of the ability to install additional "lines" in a pre-defined number range potentially could hamper our ability to further deploy switched video service offerings using ISDN.

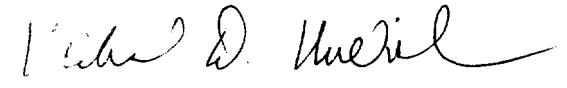
Currently DIS provides regionalized 5 digit abbreviated dialing plans for the 52,000 government subscribers of its local telephone services. Under the proposed order, abbreviated dialing plans would no longer be possible. This would cause the state to incur substantial one-time costs to convert all of its voice, voice messaging, and interactive voice response switches to a new dialing plan. In addition to the switch conversion, subscribers using any form of automated dialing or routing would be required to reprogram their equipment.

Further, the vast majority of our relationships with our CLECs, LECs and IXC's are contractual. Such contracts allow DIS to realize dramatically improved discounts on the services we use. The carriers are able to offer these discounts due to the concentration and volume of service DIS acquires and the inherent efficiencies in dealing with large blocks of service in the routine, concise, and automated manner that accrues from having intelligently sized blocks of numbers available for delivery of service. DIS anticipates that the very competitive rates it currently enjoys in its contracts with carriers will be adversely impacted by the substantial increase in complexity of number administration that will result from this order.

Finally, our ability to deliver service in a timely manner will be seriously diminished. Today we are able to simply assign a number from a pre-assigned pool to rapidly deliver critical services. We see the 45-day and 5-day rules as being inappropriate for our applications. For routine orders, the 5-day rule will likely cause a change of number during the installation cycle since we typically experience much longer installation cycles. Large projects with hundreds of phones will always take more than the 45 days allowed for number "Reservation" to complete. Installations such as this will always have a public awareness component of directory, advertising, stationery, and business card publishing that cannot tolerate number changes.

While we understand that the Commission has the responsibility to efficiently administer the NANP, we believe that the rules as presently constituted fail to acknowledge the efficiencies experienced by the very large business and government clients served by efficiently managed telephony networks. We respectfully request that the Commission reconsider the requirement for the Numbering Resource Optimization Order, or minimally, bring it more in line with reasonable business planning cycles where project implementations generally are on a 9-12 month planning cycle.

Sincerely,



Michael D. McVicker, Assistant Director
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